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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ADON BANKS,

                Plaintiff,

    vs.

S/CO LIMA, et. al.,

             Defendants.

Case No. 2:22-cv-1622-CDS-BNW

JOINT STIPULATION (WITH PROPOSED ORDER) TO CONTINUE ALL DISCOVERY DEADLINES

(SECOND REQUEST)

Pursuant to Local Rules IA 6-1 and 26-4, Plaintiff Adon Banks and Defendants, stipulate to continue all discovery deadlines in this matter by 120-days. This is the parties' second request for an extension of discovery deadlines. This Stipulation is supported by good cause and excusable neglect.

A.   Discovery Completed:

Defendants have provided initial and supplemental disclosures. Plaintiff has propounded written discovery which has been responded to by Defendants.

B.   Discovery Remaining:

Both parties will need to take depositions of fact and expert witnesses. Additionally, the parties may need to propound additional written discovery.

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C.   Need for Extension of Discovery Plan:

Counsel for the respective parties have communicated regarding this request and agree that an extension is needed to complete discovery in this case while balancing their other competing case commitments. For instance, counsel for Plaintiff commenced a trial on April 15, 2024 in a complex medical malpractice case. Although the trial was expected to last 4-weeks, the matter resolved on April 22, 2024. However, because of the significant preparation required for that trial, counsel for Plaintiff was simply not able to dedicate the time needed for the completion of discovery in this case. Similarly, counsel for Defendants has also been very busy during the past month and has numerous case-related deadlines in other matters coming due within the next 60-days.

In light of what the parties' counsel have represented above, an extension of 120-days for all discovery deadlines is both reasonable and necessary. As noted earlier, this is the parties' second request for an extension of time.

D.   Proposed New Discovery Schedule:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Close of Discovery	June 21, 2024	**October 21, 2024 (Monday)**
Amend Pleadings and/or Add Parties	April 22, 2024	**August 20, 2024 (Tuesday)**
Initial Expert Disclosures	April 22, 2024	**August 20, 2024 (Tuesday)**
Rebuttal Expert Disclosures	May 22, 2024	**September 19, 2024 (Thursday)**
Dispositive Motions	July 22, 2024	**November 20, 2024 (Wednesday)**
Pre-Trial Order	August 22, 2024	**December 20, 2024 (Friday)[1]**

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[1] The parties agree that in the event either party files a dispositive motion, the requirement to

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E.   Conclusion

For the reasons set forth above, the parties respectfully request that the Court approve

this Stipulation and the proposed deadlines extending all discovery deadlines.

DATED this 24th day of April 2024.

Respectfully submitted,

/s/ *Kyle Hill*   /s/ *Paul S. Padda*

_____   _____
Kyle Hill, Esq.   Paul S. Padda, Esq.
Deputy Attorney General   *Attorney for Plaintiff*
Attorney for Defendants

IT IS SO ORDERED:

**The parties' second stipulation for extension of
discovery deadlines is hereby approved. The
dates proposed by the parties in paragraph
"D" of the Stipulation shall govern further
proceedings with the close of discovery
extended to October 21, 2024.**

_____
UNITED STATES MAGISTRATE JUDGE

DATED: _____4/26/2024_____

file a Pretrial Order pursuant to Local Rule 16-4 shall be suspended to and until 30-days <u>after</u>
the Court issues a ruling/decision on all dispositive motions.

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